

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:18-cr-975-CDP (JMB)
)
CHRISTOPHER MYERS,)
)
 Defendant.)

**FIRST MOTION TO CONTINUE DEFENDANT’S COMBINED
PLEA AND SENTENCING**

COMES NOW Defendant, Christopher Myers, by and through counsel, and hereby moves this Court to continue the combined plea and sentencing set for January 5 to any date after February

28. In support of this motion, Defendant states as follows:

1. Defendant recently began new employment.
2. The employment presents a long-term career opportunity with positive pay, benefits, and the potential for advancement.
3. Defendant participated in three interviews and completed a background check to obtain the employment.
4. Defendant is on probationary status with his new employer through February 28.
5. To date, Defendant’s case has generated much publicity, and he expects his plea and sentencing to do the same.
6. Not unreasonably, Defendant is concerned that the publicity generated by his plea and sentencing could compromise his new employment and the productive path he’s paved for his post-sentencing future.
7. As this Court knows, gainful employment is a critical component of success on probation and, assuming this Court follows the parties’ Rule 11(c)(1)(C) plea

agreement, this Court will place Defendant on probation at sentencing.

8. Thus, if granted, this motion will do no more than give Defendant his best chance to succeed going forward, a chance each Defendant deserves.
9. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Carrie Costantin.
10. Ms. Costantin objects to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court continue the combined plea and sentencing set for January 5 to any date after February 28.

Respectfully submitted,

By: */s/ Adam D. Fein*

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2020¹, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Carrie Costantin and Mr. Robert Livergood, Assistant United States Attorneys.